

Exhibit G

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

JUANA CRUZ, OFELIA)
BENAVIDES, JOSE ELIAS N.G,)
GABRIELA VELAZQUEZ, RICARDO)
GONZALEZ, HELESIO CRUZ,)
ANGELICA CHAVEZ, CONCEPCION)
PEREZ, OLGA PEREZ, MAVRIGO)
SAENZ, JORGE MAOLEON, HECTOR)
SANCHEZ, HECTOR GONZALEZ,)
YESSY PEREZ-MARTINEZ, MARIA)
DE LOURDES CRUZ, RESENDO)
LIEVANOS, ELIZABETH LARA,)
LUIS ALBERTO)
ZUNIGIA-CASTILLO, MIGUEL)
CABALLERO SANCHEZ, GUILLERMO)
DE LA CRUZ-MENDOZA, CARLOS)
DANIEL LOPEZ, GILDA RIVAS,)
ARMANDO MORALES DE LLANO,)
LAZARO GARCIA, MARIA DE)
JESUS MEDINA, RICARDO)
ESQUIVEL, RAFAEL SANCHEZ,)
GUILLERMO RUIZ, ROSA)
QUINTANILLA,)

PLAINTIFFS,)

VS.)

DELGAR FOODS LLC A/K/A)
DELIA'S TAMALES,)

DEFENDANT.)

CIVIL ACTION
NO. 7:23-CV-00343

JURY DEMANDED

ORAL DEPOSITION OF
LUIS ZUNIGA
June 28, 2024

1 ORAL DEPOSITION of LUIS ZUNIGA, produced as a
2 witness at the instance of the Defendant, and duly
3 sworn, was taken in the above-styled and numbered cause
4 on the 28th day of June, 2024, from 10:26 a.m. to
5 12:12 p.m., before Anica Diaz, CSR, RPR, CRR, in and for
6 the State of Texas, reported by machine shorthand, at
7 the Law Offices of Ricardo Gonzalez, 124 South 12th
8 Avenue, Edinburg, Texas, pursuant to the Federal Rules
9 of Civil Procedure and the provisions stated on the
10 record or attached.

A P P E A R A N C E S

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ALSO PRESENT:

Mr. Luis Gonzalez, Interpreter
Mr. Rosendo Lievanos, Plaintiff
Ms. Olga Perez, Plaintiff

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1 Q. Were you familiar with or did you ever have to
2 use the point of sales system at the store?

3 A. No.

4 Q. Sir, in terms of damages from this lawsuit,
5 what are you asking for?

6 A. Well, that it was many hours that I worked.

7 Q. Okay.

8 A. We would work 80 to 90 hours all year.

9 Q. Do you know who set your pay at Delia's?

10 A. No.

11 Q. Do you know who made the decision to hire you?

12 A. No.

13 Q. Do you know who made the decision to terminate
14 your employee -- your employment, excuse me.

15 A. No.

16 Q. Do you know who made the decision to promote
17 you to manager?

18 A. No.

19 Q. Do you know who made the decision to set your
20 pay?

21 A. No.

22 Q. Do you know who made the decision to give you
23 raises?

24 A. No.

25 Q. Do you know who made the decision as to the

1 amounts of your bonuses?

2 A. No.

3 Q. Do you know who made the decisions about what
4 benefits to offer you?

5 A. No.

6 Q. Were you ever written up or suspended by the
7 company?

8 A. No.

9 Q. And is that because you followed all of the
10 policies and procedures of Delia's?

11 A. Yes.

12 Q. Your annual salary, including your bonus, I
13 believe was -- give me just a second.

14 A. Okay.

15 Q. Was about 75, \$76,000 per year; is that right?

16 A. I've never added up. I've never added the
17 numbers.

18 Q. Okay. Does that sound wrong to you?

19 A. It's fine.

20 Q. Okay. And let me just clarify -- (Mr. Quezada
21 continues in Spanish) -- not so much that if it sounds
22 bad, but does it sound incorrect? (Mr. Quezada
23 continues in Spanish.)

24 A. No, it's fine.

25 Q. Okay. Sir, you've heard some discussion about